

CAIN & HERREN, ALC
ATTORNEYS AT LAW
Michael J. Collins #9087
2141 W. Vineyard Street
Wailuku, Hawai'i 96793
Tel: (808) 242-9350
Fax: (808) 242-6139
Email: mike@cainandherren.com
Attorneys for Defendants OWEN H. D'SOUZA ET AL.

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

JTH Tax LLC, doing business as
Liberty Tax Service

Plaintiff,

vs.

OWEN H. D'SOUZA; NORMA C.
D'SOUZA; PICASSO TRIGGER
COMPANY LLC,
Defendants.

1:20-cv-00087-JAO-KJM
(840 Trademark)

DEFENDANTS'
SUPPLEMENTAL TRIAL BRIEF

Trial

Date: June 28, 2021

Time: 8:30 a.m.

Judge: Hon. Jill A. Otake

DEFENDANTS' SUPPLEMENTAL TRIAL BRIEF

COMES NOW, Defendants OWEN H. D'SOUZA, NORMA C.

D'SOUZA, and PICASSO TRIGGER COMPANY LLC, by and through

their attorneys, CAIN & HERREN, ALC, and pursuant to Paragraph 29 of

the Rule 16 Scheduling Order, which was filed June 26, 2020, Dkt. 23,

Defendants' Trial Brief

JTH Tax LLC v. Owen H. D'Souza, et al.

1:20-cv-00087-JAO-KJM

submits the following supplemental trial brief.

Choice of Law

Defendants stipulate that Virginia law should apply to the franchise agreements.

Dated: Wailuku, Maui, Hawaii, Friday, June 18, 2021.

CAIN & HERREN, ALC



Michael J. Collins, Esq.

*Attorneys for Defendants Owen H. D'Souza,
Norma C. Souza & Picasso Trigger
Company LLC*